

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ALEX GOLDFARB,
Plaintiff,

v.

CHANNEL ONE RUSSIA and
RT AMERICA, a.k.a. ANO TV-NOVOSTI,
Defendants.

Case No. 1:18-cv-08128-VEC

ORAL ARGUMENT REQUESTED

**RT AMERICA, A.K.A. ANO TV NOVOSTI'S MOTION FOR
RECONSIDERATION OR, IN THE ALTERNATIVE, CERTIFICATION
OF THE COURT'S MARCH 4, 2020 ORDER FOR INTERLOCUTORY APPEAL**

PLEASE TAKE NOTICE that, pursuant to Rules 54(b) and 60(b) of the Federal Rules of Civil Procedure, Local Civil Rule 6.3, and 28 U.S.C. § 1292(b), Defendant RT America, a.k.a. ANO TV Novosti, hereby presents this motion for reconsideration of this Court's March 4, 2020 Order. In the alternative, TV Novosti petitions the Court to certify its Order for interlocutory appeal pursuant to 28 U.S.C. § 1292(b). A memorandum of law in support of this motion is filed herewith.

Counsel for TV Novosti has conferred with counsel for Plaintiff, and Plaintiff opposes the relief requested herein.

Dated: March 18, 2020
Washington, DC

Respectfully submitted,

WHITE & CASE

/s/ Nicole Erb

Nicole Erb

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